

Letter of Transmittal



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Date: November 1, 2004 Project No.: 4000-PA4072-02
To: Mr. John T. Buckley
U.S. Nuclear Regulatory Commission
TWEN, 7F27
Washington, DC 20555
Re: Kaiser Tulsa Site
Thorium Remediation Project

We are sending you the following item(s):

Quantity	Date	No.	Description
1	October, 2004		Kaiser Procedure KAI-11, Revision 3
1	October 2004		Updated Kaiser procedure list

These are transmitted as checked below:

- ☐ For your use ☒ Enclosed
☐ As Requested ☐ Under Separate Cover via: _____
☐ Return of requested material
☒ Other: For your information.

Remarks: On behalf of Kaiser Aluminum & Chemical Corporation, the above referenced procedure is transmitted for your information.

Copy to: Distribution (see attached) Signed: Chuck Beatty

If enclosures are not as noted, please notify our office immediately.

NMSS01

Kaiser Plan and Procedure Distribution

<p>Mr. John T. Buckley US Nuclear Regulatory Commission TWFN, 7F27 Washington, DC 20555</p> <p>FedEx</p>	<p>Mr. S Paul Handa Kaiser Aluminum & Chemical Corporation 7311 East 41st Street Tulsa, OK 74145</p> <p>(Three copies in one FedEx envelope)</p>
<p>US Nuclear Regulatory Commission Document Control Desk Washington, DC 20555-0001</p> <p>FedEx</p>	<p>Diana Brown RECON 7311 East 41st Street Tulsa, OK 74145</p> <p>FedEx</p>
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Procedure to Investigate and Rectify Items of Nonconformance


Kaiser Aluminum & Chemical Corporation
Thorium Remediation Project
Tulsa, Oklahoma

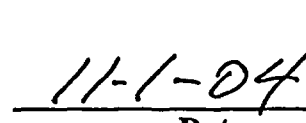
Kaiser Aluminum & Chemical Corporation
Baton Rouge, Louisiana

Project No. 5427R
April 2001
Revised October 2003
Revised October 2004


Approval

The plan has been approved by:


J. W. Vinzant
Project Manager


Date

Reviewed by:


L. Max Scott
Health Physics Advisor/Radiation Safety Officer

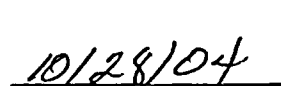

Date

Table of Contents

	<u>Page</u>
Signature Page	
1.0 Purpose	1
2.0 Definitions	1
3.0 Notification of Items of Nonconformance	1
4.0 Investigation of Items of Nonconformance	1
4.1 Minor Item	1
4.2 Major Item	2
5.0 Corrective Actions	2
5.1 Minor Item	2
5.2 Major Item	2

**Procedure to Investigate and Rectify Items of Nonconformance
Kaiser Aluminum & Chemical Corporation
Thorium Remediation Project
Tulsa, Oklahoma**

1.0 Purpose

To establish a formal procedure to investigate and rectify items of nonconformance.

2.0 Definitions

Minor Nonconformance Item - any deviation from established policies, remediation plans, safety work permits or established health physics practices which do not have a serious impact on health and safety or the completion of remediation activity.

Major Nonconformance Item - any deviation from established policies, remediation plans, safety work permits or established health physics practices which could have a serious and immediate impact on health and safety or the completion of a remediation activity.

3.0 Notification of Items of Nonconformance

Any person that discovers an item of nonconformance shall report such to the Kaiser Aluminum & Chemical Corporation (Kaiser) Site Administrator (SA) or Kaiser Project Manager (PM).

4.0 Investigation of Items of Nonconformance

4.1 Minor Item

- The Kaiser SA or designee will review the item of nonconformance with the person who brings it to his attention.
- The Kaiser SA will establish the fact that the item is in fact an item of nonconformance. If it is determined that there was not an item of nonconformance, the Kaiser SA shall document such by recording in a daily log or other suitable fashion.
- If the Kaiser SA determines the item of nonconformance could be major, he shall follow the steps listed in Section 5.1 of this procedure.

4.2 Major Item

- The Kaiser SA shall immediately notify the Kaiser PM and advise him that a potential major item of nonconformance has been identified.
- The Kaiser PM will review the item with the Kaiser SA and if he agrees, the following steps will be taken. If the Kaiser PM determines that the item of nonconformance is not major, it will be treated as a minor item of nonconformance. The Kaiser PM or his designee will undertake corrective actions as listed below.

5.0 Corrective Actions

5.1 Minor Item

The Kaiser SA will undertake corrective actions as follows:

- Conduct a review of the circumstances that led to the item of nonconformance.
- Identify the root cause of the item of nonconformance, if feasible.
- Take actions to correct the item of nonconformance.
- Document actions.

5.2 Major Item

The Kaiser PM or his designee will undertake corrective actions as follows:

(1) Conduct a complete review of the circumstances that led to the item of nonconformance. In conducting a review of the circumstances, consider the following:

- Interviews with individuals who are either directly or indirectly involved in the item of nonconformance, including management personnel and those responsible for training or procedure development/guidance.
- Tours and observations of the area where the nonconformance occurred. During the tour, individuals should look for items that may have contributed to the item of nonconformance as well as those items that may result in future items of nonconformance.
- Review of programs, procedures, audits, and records that relate directly or indirectly to the item of nonconformance. The program should be reviewed to ensure that its overall objectives and requirements are clearly stated and implemented. Procedures should be reviewed to determine whether they are complete, logical, understandable, and meet their objectives. Records should be reviewed to determine whether there is sufficient documentation of necessary tasks to provide an auditable record and to determine whether

similar items of nonconformance have occurred previously. Particular attention should be paid to training and qualification records of individuals involved with the item of nonconformance.

- (2) Identify the root cause of the item of nonconformance, if feasible.
- (3) Take prompt and comprehensive corrective action that will address the immediate concerns and prevent recurrence of the item of nonconformance.
- (4) Document findings.

The decision to stop work will be evaluated on a case-specific basis by the Kaiser PM and/or SA. Kaiser's PM will notify the Nuclear Regulatory Commission by telephone in the event that a nonconformance cannot be corrected.

Readily correctable, non-recurring nonconformance items may be immediately corrected without following the steps discussed above at the direction of the RSO, Assistant RSO or SA, at their discretion, as long as there is no impact on health and safety or on the completion of remedial activity.

Kaiser Tulsa Thorium Site Procedures

KAI-01	Monitoring Surface Water for Radioactivity (aka Fulton Creek water Monitoring)	Replaced by KAI-07 and Work Plan
KAI-02	Ground Water Radioactivity Measurement	Replaced by KAI-03 and Work Plan
KAI-03	Ground Water Sampling Procedure ; Revision 2	Updated June, 2003
KAI-04	Procedure for Field Measurement of Chemical Parameters; Revision 2	Updated June, 2003
KAI-05	Field and Laboratory Chemical and Radiological Data. Evaluation Procedure	Does not exist
KAI-06	Quality Assurance Plan ; Revision 3	Updated May, 2004
KAI-07	Surface Water Sampling Procedure; Revision 2	Updated June, 2003
KAI-08	Environmental (Off-Site) Air Sampling Procedure; Revision 2	Updated October, 2003
KAI-09	Audit Procedure; Revision 2	Updated October, 2003
KAI-10	Safety Work Permit Procedure; Revision 3	Updated May, 2004
KAI-11	Procedure to Investigate and Rectify Items of Nonconformance; Revision 3	Updated October, 2004
	Work Plan for Groundwater and Surface Water Sampling, Revision 4	Updated December, 2003
	Environmental Health and Safety Plan; Revision 4	Updated May, 2004
	Radiation Health and Safety Plan; Revision 1	Updated May, 2004